

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOISLARONE WILLIAMS(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

23-cv-15025
Judge Gettleman
Magistrate Judge Cole
RANDOM / PC 2CHICAGOGregory J. DohertyJonathan M. DavisDavid S. MadiaEdgar Zarabozo RodriguezGregory Sweeney(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

☒COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)☐COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)☐

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

RECEIVED
OCT 16 2023 EW
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

I. Plaintiff(s):

- A. Name: LARONE WILLIAMS
- B. List all aliases: _____
- C. Prisoner identification number: 2022-072-4080
- D. Place of present confinement: COOK COUNTY JAIL
- E. Address: 2700 S. CALIFORNIA, 60608, CHICAGO, IL

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: GREGORY J DOWNEY
Title: POLICE OFFICER
Place of Employment: CITY OF CHICAGO
- B. Defendant: JOHNATHAN M DAVID
Title: POLICE OFFICER
Place of Employment: CITY OF CHICAGO
- C. Defendant: DANN S MADIA
Title: POLICE OFFICER
Place of Employment: CITY OF CHICAGO

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

ADDITIONAL DEFENDENTS

2.1

DEFENDENT - EDGAR ZANABORA RODRIGUEZ
TITLE - POLICE OFFICER
PLACE OF EMPLOYMENT - CITY OF CHICAGO

DEFENDENT - GREGORY SWEENEY
TITLE - POLICE OFFICER
PLACE OF EMPLOYMENT - CITY OF CHICAGO

DEFENDENT - CHICAGO
TITLE - CITY OF CHICAGO
PLACE OF EMPLOYMENT - CHICAGO POLICE

DEFENDENT -
TITLE -
PLACE OF EMPLOYMENT -

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: NONE
- B. Approximate date of filing lawsuit: _____
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: _____
- D. List all defendants: _____
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): _____
- F. Name of judge to whom case was assigned: _____
- G. Basic claim made: _____
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): _____
- I. Approximate date of disposition: _____

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

See Additional pages, Immediately Following

(Complaint)

THIS IS A COMPLAINT UNDER "42 USC SECTION 1983" FOR VIOLATIONS OF MY FOURTH AMENDMENT RIGHTS THAT CAUSED ME TO SPEND 30 DAYS IN THE COOK COUNTY JAIL, IN THE MIDDLE OF A PANDEMIC, DURING THE HOLIDAYS, FOR A CRIME THAT I HAD NOTHING TO DO WITH.

I AM SUING FOR WRONGFUL SEARCH AND SEIZURE, FAKE ARREST, AND FEDERAL MALICIOUS PROSECUTION. SPECIFICALLY, DEFENDENT CHICAGO POLICE OFFICERS, GREGORY J. DOHERTY, JONATHAN M. DAVID, DAVID S. MADIA, EDGAR ZARABOZA RODRIGUEZ, AND GREGORY SWEENEY, WHILE ACTING IN THE SCOPE OF THEIR EMPLOYMENT, AND UNDER COLOR OF LAW: 1) STOPPED & SEARCHED ME WITHOUT PROBABLE CAUSE; 2) ARRESTED ME WITHOUT PROBABLE CAUSE; 3) CAUSED ME TO BE DETAINED AT COOK COUNTY JAIL AND PROSECUTED WITHOUT PROBABLE CAUSE. THESE OFFICERS FORMED A CONSPIRACY TO DO THIS TO ME. THE CITY OF CHICAGO AS THE EMPLOYER OF DEFENDENT OFFICERS IS USED FOR PURPOSES OF INDEMNIFICATION. I SEEK COMPENSATORY AND PUNITIVE DAMAGES FOR MY INJURIES.

ON THE NIGHT OF DECEMBER 23, 2021, I WAS AT THE CTA REDLINE STATION AT JACKSON AND STATE, ON MY WAY TO HANDLE BUSINESS, I HAD BEEN IN THE CTA STATION WAITING ON THE TRAIN FOR ABOUT 15-20 MINUTES, PREVIOUSLY UNBOARDING ANOTHER CTA TRAIN, I DID NOT VISIT ANYTHING THAT DAY OR EVENING. AROUND 11PM, A GROUP OF CHICAGO POLICE, INCLUDING DEFENDENTS, DAVID, MADIA, ZARABOZA RODRIGUEZ, AND DOHERTY, APPROACHED A WOMAN NEARBY, PICKED HER UP & I BELIEVED SLAMMED HER TO THE GROUND, AFTERWARDS, HANDCUFFING HER, THE OFFICERS WERE ACTING VERY AGGRESSIVELY.

I ASKED QUESTIONS OUT LOUD, "WHAT'S WRONG," "WHAT DID SHE DO" & DEFENDENT OFFICER DOHERTY SAID TO THE GROUP OF OFFICERS, "ALL OF THEM, ALL OF THEM, GET HIM TOO!" THEN PROCEEDED POINTING AT ME AND OTHER PEOPLE ON THE PLATFORM, UPON INFORMATION AND BELIEF, DOHERTY SINGLED ME OUT IN RECKLESS DISREBEARD OF MY RIGHTS, BASED ON HIS PREVIOUS FAMILIARITY WITH ME AS A CTA PASSENGER. DEFENDENT OFFICERS DAVID AND MADIA AND ZARAZOLA RODRIGUEZ, TALKED TO ME AND THEN DETAINED ME WITH MANNICUFFS, THESE OFFICERS SEARCHED ME FROM BODY TO ALL MY POCKETS, WHILE I ASKED THEM WHAT HAPPENED OR WHAT WAS HAPPENING. REPEATEDLY I ASKED THE OFFICERS QUESTIONS ABOUT WHAT HAPPENED TO CAUSE THE ARREST AND SEARCH, BECAUSE I HAD NO IDEA WHY I WAS BEING ARRESTED, BECAUSE I WAS NOT INVOLVED IN ANY CRIMES.

DEFENDENT OFFICER DAVID AND ZARAZOLA RODRIGUEZ TOOK ME TO A POLICE CAR AND SEARCHED ME AGAIN SOON AFTER. DAVID, SHOCKINGLY, REPEATEDLY TOLD ME THAT HE DIDN'T KNOW WHY HE WAS ARRESTING ME WHEN I ASKED HIM WHAT WAS HAPPENING. AT THE POLICE STATION, DEFENDENT OFFICER SWEENEY ATTEMPTED TO INTERVIEW ME, DESPITE HAVING NOTHING TO DO WITH THIS CRIME, AND THE FACT THAT THE OFFICERS KNEW I HAD NOTHING TO DO WITH THIS CRIME, I WAS CHARGED WITH TWO FELONIES. AFTER I SPENT 30 DAYS IN COOK COUNTY JAIL, BECAUSE OF THIS ARREST AND PROSECUTION, THE STATE HAD DISMISSED THE CHARGES AGAINST ME, I HAD TO SPEND THE HOLIDAYS IN JAIL, IN A PANDEMIC BECAUSE OF THE ACTIONS OF THE DEFENDANTS, THIS PERSONALLY CAUSED ME EMOTIONAL DISTRESS DUE TO MY PTSD, & THE LENGTH OF A PRISON SENTENCE IF WRONGFULLY CONVICTED, ALSO PAIN CAUSED TO MY CHILDREN FOR NOT ABLE TO BE PRESENT DURING THE HOLIDAYS, MY MOTHER WHO IS DIAGNOSED WITH BIPOLAR & SCHIZOPHRENIA, WAS STRESSED IN WORRIED AFTER UNDERGOING A RECENT HEART SURGERY SHE WAS HOSPITALIZED AGAIN WITH COVID, WHICH CAUSED ME MORE STRESS FOR THE BOTH OF US

These officers acted together and formed an agreement to violate my civil rights. For example Officer David, Madia, and Zarabaza Rodriguez, arrested me on the instructions of Officer Doherty, and no officers took steps to stop the violations, of my constitutional rights. Similarly, the officers were responsible for different parts of my detention, handing me off one to another as part of their plan, that day to violate my rights. This conspiracy is part of my law suit.

My rights were violated when Defendant Officer Doherty, David, Zarabaza Rodriguez and Madia handcuffed and searched me without probable cause on any lawful basis on December 23, 2021, my rights were also violated when these same officers arrested me without probable cause on December 23, 2021. My rights were also violated because I was detained and prosecuted without probable cause due to the actions of the defendants and that prosecution ended favorably to me on January 24, 2022. These Defendants formed an agreement to violate my rights and took over actions to accomplish this goal. I know Demand Trial By Jury! Thank you

LALONE WILLIAMS

2022-072-4080



[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

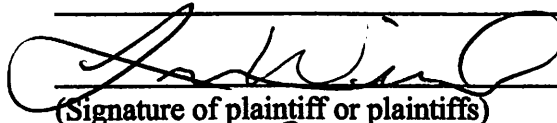
COMPENSATORY ~~AND~~ DAMAGES
RESTITUTIVE DAMAGES

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 15 day of Sep, 2023


 (Signature of plaintiff or plaintiffs)

LARONE WILLIAMS
 (Print name)

2022-072-4080
 (I.D. Number)

2700 S. CALIFORNIA
CHICAGO, IL 60608

(Address)

ARLONE WILLIAMS
2022-072-4080
DIVISION 6-2/R
P.O. Box 089002
270 S. CALIFORNIA AVE
Chicago, IL 60608



Case: 1:23-cv-15025 Document #: 1 Filed: 10/16/23 Page 10 of 11 PageID #:10

S SUBURBAN IL 604

11 OCT 2023 PM 8 L



DIRKSEN BUILDING
219 S. DEARBORN 20th FLOOR
CHICAGO, IL 60604



RECEIVED

OCT 18 2023

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

60604-170299





23-cv-15025
Judge Gettleman
Magistrate Judge Cole
RANDOM / PC 2